

National Aeronautics and Space Administration  
Kennedy Space Center  
Kennedy Space Center, FL 32899



March 7, 2013

Reply to Attn: CC-A

TO: All NASA Civil Servants


FROM: CC/Chief Counsel

SUBJECT: National Space Club Florida Committee Monthly Luncheons for 2013

The Florida Committee of the National Space Club, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host luncheons at the Radisson Resort at the Port in Cape Canaveral, Florida on March 12, May 14, June 11, July 9, August 13, September 10, and November 12, 2012. Approximately 300 guests are expected to attend the luncheons. These guests include corporate executives, representatives of aerospace contractors and other organizations, members of academia and representatives of state and Federal government, elected officials and/or staff, media, and persons interested in space issues. The approximate value of each luncheon is \$20 per person.

I find these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in attendance at these events. The luncheons will provide employees the opportunity to demonstrate NASA's support of this program which recognizes noteworthy space-related efforts in Florida. In addition, these events are forums for employees to discuss matters of interest to NASA with a diverse group of fellow attendees interested in our activities. It is in the Government's best interest for employees to attend the luncheons as representatives of NASA. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event.

NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.

  
Jerald D. Stubbs  
Agency Designee